

**RTPI**

mediation of space · making of place

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Patron HRH The Prince of Wales KG KT PC GCB

27th May 2009

Email response sent to: gaec.consultation@defra.gsi.gov.uk

Dear Sir/Madam,

RESPONSE TO ENVIRONMENTAL STANDARDS FOR FARMING - CONSULTATION ON PROPOSED CHANGES TO STANDARDS IN CROSS COMPLIANCE GOOD AGRICULTURAL AND ENVIRONMENTAL CONDITION (GAEC) AND RELATED MEASURES IN ENGLAND

Thank you for the opportunity to respond to the above consultation. The Royal Town Planning Institute (RTPI) is a membership organisation representing over 22,000 spatial planners. It exists to advance the science and art of town planning for the benefit of the public.

This response was drafted by the RTPI Rural Planning Network following an internal consultation. Thanks are due to members of this group for their substantial contribution in reviewing the document, in particular to David Alexander.

The RTPI's comments, below, are general in nature, relating to the overall objectives of the standards and their relationship to the function of spatial planning. Comments are not submitted in relation to the detailed consultation questions.

Environmental standards for farming are important for planners and the planning system, since the success of the policies in the Local Development Framework documents that cover landscape, resource protection and biodiversity policies depends heavily on the actions of individual farmers and landowners on land surrounding and penetrating the built environment. National planning policies (such as Planning Policy Statement 7 – Sustainable Development in Rural Areas) may need to be re-adjusted in focus, to reflect both the swing back to food production, and also the successful environmental measures and benefits covered in this consultation paper. However it should be noted that the current consultation on [Draft PPS4 Planning for Prosperous Economies](#) seeks views on combining all national planning policy on economic development in urban and rural areas into one consolidated Planning Policy Statement (PPS). It is proposed that the economic policies set out in PPS7 are incorporated into a new planning policy statement. The consultation period ends on the 28th July 2009. The RTPI will be submitting a response to the consultation that will be available on the [policy pages of the RTPI website](#) once the response has been submitted.

Set-aside was never initially established for environmental benefit, but was a simple, administrative means of controlling production levels. However, environmental benefit has been arguably an important secondary effect, no doubt varying geographically and from farm to farm. Since set aside was abolished from January 2009, it is important to try and retain as many of the environmental benefits produced as possible. By providing a clear focus on these benefits, which have

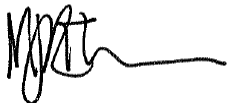
previously happened almost by default, it ought to be possible to produce them on less land and more positively integrated with the need to produce more food at a local level.

While cross compliance requirements provide a baseline of environmental and other standards for farmers (as a condition for payment under the Single Payment Scheme (SPS)), it is important that it is monitored and researched in order to produce a picture of its effectiveness. It would be helpful to see a regional and local breakdown of cross compliance, against which appropriate, tailor-made environmental policies and implementation proposals can be developed. The effective monitoring and research on cross compliance should provide the launch pad for further environmental measures, either through Entry Level or Higher Level Stewardship, or via an appropriate scheme for set aside.

While the RTPI agrees with the overall aims (set out on page 3 of the consultation document) of competition, profitability and sustainability in the farming industry, we would urge Defra to specify that "sustainability" in this context incorporates not only economic, but also social and environmental considerations.

If you require any further assistance, please contact Rhian Brimble, RTPI Network Manager on 01443 229852 or email rhian.brimble@rtpi.org.uk

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Matt Thomson', with a long horizontal flourish extending to the right.

Matt Thomson
Head of Policy and Practice